Haberdashers' West Midlands Academies Trust

WHISTLEBLOWING POLICY

2026-2029

Haberdashers' Abraham Darby

Haberdashers' Adams

WHISTLE BLOWING POLICY	
Named Responsibility of Policy	Mrs J Edgar, Principal, Haberdashers' Abraham Darby Mr D Biggins, Headteacher, Haberdashers' Adams
Date of Policy	September 2026
Date of next Review	September 2029
Governor Accountability	PSW
This policy will be readily accessible to Parents/Carers/Staff/Visitors/Members of the Public through the school websites	

COMMITMENT TO REVIEW

This Policy will be monitored and reviewed every three years by the relevant policy owners named above and/or in light of any regulatory changes or guidance that may occur during the period or any changes to DfE guidance/regulations.

Any changes will be evaluated and approved by the Governing Body

These procedures should be read in conjunction with Haberdashers' Abraham Darby and Haberdashers' Adams Child Protection & Safeguarding Policy. Safeguarding concerns, or allegations against staff (including supply staff and volunteers) will be dealt with in accordance with Keeping Children Safe in Education 2026.

Summary & aims

This procedure is aligned with the statutory guidance outlined in Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). It also reflects best practice from the Freedom to Speak Up Review and whistleblowing protections under UK law. This policy and procedure set out the HWMAT protocol to protect staff members who report colleagues or governors they believe are doing something wrong or illegal, or whom they believe are neglecting their duties. This procedure has a key role to play in safeguarding children.

As employees are often the first to realise that there may be something wrong within the school, it is important that they feel able to express their concerns without fear of harassment or victimisation. Otherwise, they may find it easier to ignore the concern rather than report it. The Public Interest Disclosure Act 1998 recognises this fact and is designed to protect employees, who make certain disclosures of information in 'the public interest', from detriment and/or dismissal. This policy and procedure build on the provisions of the Act.

Principles of whistleblowing

In HWMAT schools, we promote a culture of safety. We aim to develop practice as we learn and reflect. It is our aim for concerns to be raised, including whistleblowing in accordance with our policies and procedures. We aim to promote a school culture that is free from bullying between adults.

Our senior leadership team will be visible to all staff, volunteers and visitors to help assist anyone who needs to raise a concern to do so without barriers. Our nominated governor/Chair of Governors will also be known to staff and volunteers. Visitors will be made aware of the Headteacher/Principal's name and contact details.

In HWMAT schools we value those who raise concerns and contribute to our reflective practice. Senior leaders and governors will take all opportunities to reflect on practice at leadership and governor meetings. This will be a regular agenda item.

We welcome all concerns to be raised either informally or formally through the steps set out below. This will enable us to swiftly and thoroughly find a resolution to concerns. All concerns will be dealt with promptly and swiftly by the Headteacher/Principal and/or Chair of Governors if the whistleblowing relates to the conduct or practice of the Headteacher/Principal. While investigating any concerns they will remain proportionate and not lay blame on others. If necessary, this may involve mediation and/or dispute resolution and may involve a member of the T&W HR Team.

In HWMAT schools we understand the need for these measures to support good practice. We will ensure those who raise concerns receive the necessary support they need, such as support from a member of the senior leadership team and/or access to the employee well-being service.

All staff will receive whistleblowing training as part of their safeguarding induction. This includes how to report concerns, the protections available under the Public Interest Disclosure Act 1998, and the role of the Designated Safeguarding Lead (DSL) in managing safeguarding-related whistleblowing disclosures. Those responsible for handing concerns must also ensure they have the relevant knowledge and skills to do so.

In HWMAT schools the handling of these concerns is done so in a transparent and accountable process. If

necessary, the Headteacher/Principal and/or Chair of Governors may seek an external review of the concern.

In HWMAT schools we recognise the need to take particular measures for vulnerable groups. We will ensure that supply staff and volunteers have access to the same support and procedures as permanent staff. Black and minority ethnic backgrounds who raise concerns might need action over and above to support and protect them. Students and ECTs will also be subject to all the principles set out in these procedures. Our primary care will be embedding standards of practice to empower and protect staff and to enable them to raise concerns freely.

Culture and Prevention

HWMAT schools are committed to fostering a culture of openness, transparency, and accountability. Staff are encouraged to raise concerns early, and leaders will regularly review systems and practices to prevent wrongdoing and promote ethical conduct.

Record Keeping

All whistleblowing concerns, whether informal or formal, must be recorded securely and confidentially. Records should include the nature of the concern, actions taken, and outcomes. These records will be retained in accordance with the school's data protection and safeguarding policies.

What is a whistleblower?

You are a whistleblower if you're a worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example, pupils of the school.

As a whistleblower you're protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Who is protected by law?

You are protected if you're a worker, for example you're:

- an employee, such as a teacher or lunchtime supervisor
- a trainee, such as a trainee teacher
- an agency worker, such as supply teacher.

You can get independent advice if you're not sure you're protected, for example from Citizens' Advice.

Confidentiality clauses in employment contracts or settlement agreements cannot override whistleblowing protections. Staff are legally entitled to raise concerns in the public interest and must not be subject to detriment or dismissal for doing so.

Complaints that count as whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a criminal offence, for example fraud;
- someone's health and safety is in danger;
- risk or actual damage to the environment;
- a miscarriage of justice;
- the company is breaking the law, for example does not have the right insurance, or you believe someone is covering up wrongdoing.
- sexual harassment or unwanted conduct of a sexual nature, including where you reasonably believe this affects others or is in the public interest

Under the Employment Rights Act 2025, disclosures concerning sexual harassment are explicitly recognised as protected disclosures under the whistleblowing provisions of this Act. This means that workers who raise concerns about sexual harassment are protected from detriment and unfair dismissal in accordance with whistleblowing legislation.

Concerns in education settings may relate to the treatment of children and young people. This could mean, for example, that a person or persons are:

- deliberately ignoring the best interests of the child or young person
- teasing, harassing or touching a child or young person inappropriately
- threatening a child, young person or a parent or distressing them in some way
- neglecting a child by not giving them the support they need, including medical attention or care
- hitting or restraining a child inappropriately
- using a child or young person's money or possessions in an inappropriate way

Where whistleblowing concerns relate to safeguarding, the Headteacher/Principal must be informed immediately. They will assess the concern and determine whether it meets the threshold for referral to the Local Authority Designated Officer (LADO) or other statutory partners. Allegations against staff, including supply staff and volunteers, will be managed in accordance with Part 4 of Keeping Children Safe in Education (2026). Concerns that meet the harm threshold will be referred to the Local Authority Designated Officer (LADO), and those that do not will be handled internally with appropriate oversight.

Complaints that do not count as whistleblowing

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law unless your particular case is in the public interest.

These should be reported using the school's grievance policy.

Who to tell and what to expect

Before initiating the procedure employees should consider the following:

- the responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees
- employees should use line manager or team meetings and other opportunities to raise questions and

seek clarification on issues which are of day-to-day concern, and
- whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, employees must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.

This policy and procedure should not be used for complaints about an employee's personal circumstances, such as the way s/he has been treated at work. In these cases an employee should use the school's Grievance Procedure, unless it falls into of the categories of whistleblowing.

Where staff have concerns they should aim to report it internally first before using an external 'prescribed person or body'. Making a report to an external person may only be undertaken where the staff member thinks the school will 'cover it up', would treat them unfairly if they complained or have raised the matter before, but the concern hasn't been dealt with.

In some instances, it may be appropriate for an employee to ask the trade union to raise a matter on the employee's behalf.

A concern raised using any method is better than an employee raising no concern at all. Where an employee chooses to raise a concern in writing they should set out the background and history of the concerns, giving names, dates and places where possible, and the reasons why s/he is particularly concerned about the situation. If an employee does not feel able to put the concern in writing, s/he should telephone or meet the appropriate person. It is important that, however the concern is raised, the employee makes it clear that s/he is raising the issue via the whistle-blowing procedure.

The earlier an employee expresses the concern, the easier it is to take action.

Although an employee is not expected to prove the truth of an allegation, s/he will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

In line with Working Together to Safeguard Children (2026), particular attention will be given to supporting whistleblowers from vulnerable groups, including those from minority ethnic backgrounds, trainee teachers, and agency workers. Reasonable adjustments will be made to ensure accessibility and protection from victimisation.

Process for reporting a concern relating to fraud, theft, irregularity, bribery or misuse of funds

Examples

- Manipulation of accounting records and finances
- Inappropriate use of HWMAT assets or funds
- Decision-making for personal gain
- Receipt of bribes – see Anti-Bribery policy
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of HWMAT procedures which may advantage a particular party (for example tampering with tender documentation, failure to register personal interest)

HWMAT has designated a number of individuals to specifically deal with such matters and the whistleblower is invited to decide which of those individuals would be the most appropriate person to deal with the matter. The names, email addresses and telephone numbers of the following nominated persons are all available in the schools' telephone directories:

- Headteacher/Principal

- Chief Financial Officer
- Chair of Governors

The whistleblower may prefer to raise the matter in person, by telephone or in written form marked private and confidential and addressed to one of the above-named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

Alternatively, if the whistleblower considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed to the Department for Education.

In addition, information can be obtained from the charity, Protect, which offers free
legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation. Contact details are as follows:

Protect
The Green House
244-254 Cambridge Heath
Road London
E2 9DA
Tel: 020 3117 2520

Whichever agency is contacted, the matter will be progressed as follows:

The investigating officer will carry out a preliminary investigation; caution is needed to avoid prejudicing any criminal enquiry, to assess whether the concern has foundation. This assessment may identify the need to involve third parties to provide further information or assistance, for example other members of School staff, the schools' external auditors, legal or personnel advisors, the police, the Department for Education.

Records will be kept of work undertaken and actions taken throughout the investigation. The investigating officer, possibly in conjunction with the governing body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third-party referral, such as the police.

The whistleblower will be informed of the results of the investigation and the action taken to address the matter. If the whistleblower is dissatisfied with the conduct of the investigation or resolution of the matter, the concerns should be raised with the investigating officer and the governing body.

Existing good practice within HWMAT in terms of systems of internal control both financial and non-financial and the external regulatory environment in which HWMAT operates are designed to ensure that cases of suspected fraud or impropriety rarely occur. This whistleblowing policy is provided to establish a framework within which issues can be raised confidentially internally and if necessary, outside the management structure of both schools.

Process for reporting all other Whistle-blowing concerns

Step 1: Report your concern to the **Headteacher/Principal** unless you feel they will cover it up, would treat you unfairly if you complained or have raised the matter before, but the concern hasn't been dealt with.

Step 2: You should report your concern to the **Chair of Governors** if the concern relates to the actions of the **Headteacher/Principal** unless you feel they will cover it up, would treat you unfairly if you complained or have raised the matter before, but the concern hasn't been dealt with.

Step 3: You may report your concern to a prescribed person or body, including but not limited to:

OFSTED; NSPCC Children's Commissioner for England; Secretary of State for Education; 'Public Concern at Work', a Whistleblowing charity

Step 4: You may seek legal advice or contact your MP

Making your claim anonymously or confidentially

You can tell the identified persons at HWMAT schools anonymously; all reports will be considered seriously; however, the ability to investigate may be limited if insufficient detail is provided. Where possible, whistleblowers are encouraged to provide contact details confidentially. You can give your name but request confidentiality - the person or body you tell should make every effort to protect your identity.

If you report your concern to the media, in most cases you'll lose your whistleblowing law rights.

What your employer or a prescribed person will do

The Headteacher/Principal or the prescribed person will listen to your concern and decide if any action is needed. You may be asked for further information.

You must say straight away if you do not want anyone else to know it was you who raised the concern.

You will not have a say in how your concern is dealt with.

The Headteacher/Principal or the prescribed person will keep you informed about the action they've taken, but they cannot give you much detail if they have to keep the confidence of other people.

A prescribed person cannot help you with your relationship with your employer.

If you're not satisfied with how the Headteacher/Principal/Chair of Governors dealt with your concern tell someone else or a prescribed person or body if you believe your concern was not taken seriously or the wrongdoing is still going on. Contact the Advisory, Conciliation and Arbitration Service (ACAS), the whistleblowing charity Protect or your trade union for more guidance.

The role of the Headteacher/Principal or Chair of Governors

The Headteacher/Principal or Chair of Governors may be informed by an employee about concern(s) and that s/he is "blowing the whistle" within the procedure in person; or in writing or over the phone.

The Headteacher/Principal or Chair of Governors should respond immediately by arranging to meet with the employee to discuss the concern(s) as soon as possible.

Where whistleblowing concerns relate to safeguarding, the school will work in partnership with statutory safeguarding partners, including health, police, and local authority services, to ensure a coordinated and effective response.

At each meeting under this policy the employee may bring a colleague or trade union representative. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Monitoring and Review:

The Governing Body will monitor whistleblowing cases annually to identify trends, ensure accountability, and promote a culture of openness. Lessons learned will inform staff training and policy updates.

Stage One:

At the initial meeting the Headteacher/Principal or Chair of Governors should establish that:

- there is genuine cause and sufficient grounds for the concern; and
- the concern has been appropriately raised via the Whistleblowing Policy.

The Headteacher/Principal or Chair of Governors should ask the employee, to put their concern(s) in writing, if s/he has not already done so. If the employee is unable to do this the Headteacher/Principal or Chair of Governors will take down a written summary of his/her concern/s and provide him/her with a copy after the meeting. The Headteacher/Principal or Chair of Governors should make notes of the discussions with the employee. The employee's letter and/or Headteacher's/Principal's or Chair of Governor's notes should make it clear that the employee is raising the issue via the Whistleblowing procedure and provide:

- the background and history of the concerns;
- names, dates and places (where possible); and
- the reasons why the employee is particularly concerned about the situation.

The employee should be asked to date and sign their letter and/or the notes of any discussion. However, for concerns raised anonymously this is optional. For those who raise anonymous concerns, the concern should be dealt with anonymously. Although, this does not prevent the person who the concern is raised against identifying the person who reported the concern. Those responsible for handling the concern should never confirm the source and should do all that they can to protect the source.

The Headteacher/Principal or Chair of Governors should follow the policy as set out above and in particular explain to the employee:

- who he/she will need to speak to in order to determine the next steps
- what steps s/he intends to take to address the concern
- how s/he will communicate with the employee during and at the end of the process. It should be noted that the need for confidentiality may prevent the school giving the employee specific details of any necessary investigation or any necessary disciplinary action taken as a result
- that the employee will receive a written response within ten working days
- that their identity will be protected as far as possible, but should the investigation into the concern require the employee to be named as the source of the information, that this will be discussed with the employee before their name is disclosed
- that HWMAT and the Governing Body will do all that it can to protect the employee from discrimination and/or victimisation
- that the matter will be taken seriously and investigated immediately;
- that if the employee's concern, though raised as a genuine concern, is not confirmed by the

investigation, no punitive action will be taken against them

- if clear evidence is uncovered during the investigation that s/he has made a malicious or vexatious allegation, disciplinary action may be taken against them; and

- the investigation may confirm their allegations to be unfounded in which case the Headteacher/Principal and Governing Body will deem the matter to be concluded unless new evidence becomes available.

Stage Two:

Following the initial meeting with the employee, the Headteacher/Principal or Chair of Governors should consult with the Chair of Governors/Trustees to determine whether an investigation is appropriate and, if so, what form it should take. A record should be made of the decisions and/or agreed actions.

It may be necessary, with anonymous allegations, to consider whether it is possible to take any further action. When making this decision, Headteacher/Principal or Chair of Governors should take the following factors into account:

- the seriousness of the issue(s) raised

- the credibility of the concern(s) and

- the likelihood of confirming the allegation(s) from attributable sources.

In some cases, it may be possible to resolve the concern(s) simply, by agreed action or an explanation regarding the concern(s), without the need for further investigation. However, depending on the nature of the concern(s) it may be necessary for the concern(s) to:

- be investigated internally;

- be investigated by the local authority;

- be referred to the police;

- be referred to the external auditor; or

- form the subject of an independent inquiry.

The Headteacher/Principal or Chair of Governors should have a working knowledge and understanding of other school policies and procedures, e.g. grievance, disciplinary, harassment, child protection procedures, to ensure that concerns raised by employees are addressed via the appropriate procedure/process.

Stage Three:

Within ten working days of a concern being received, the manager receiving the concern must write to the employee:

- acknowledging that the concern has been received;

- indicating how they propose to deal with the matter;

- giving an estimate of how long it will take to provide a final response; and/or

- telling the employee whether any initial enquiries have been made; and

- telling the employee whether further investigations will take place, and if not why not; and/or

- letting the employee know when s/he will receive further details if the situation is not yet resolved.

Untrue Allegations

If an employee makes an allegation where s/he has a genuine concern, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, we conclude that an employee has made malicious or vexatious allegations, or with a view to personal gain, disciplinary action may be taken against that employee.

Unfounded Allegations

Following investigation, allegations may be confirmed as unfounded. This outcome will be notified to the employee who raised the concern, who will be informed that the Governing Body deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

If you're treated unfairly after whistleblowing

You can take a case to an employment tribunal if you've been treated unfairly because you've blown the whistle.

You can get further information from the Advisory, Conciliation and Arbitration Service (Acas), Citizens' Advice, the whistleblowing charity Protect or your trade union.

If you reported your concern anonymously, you may find it harder to argue that your unfair treatment was as a result of your whistleblowing.

You must raise any claim of unfair dismissal within 3 months of your employment ending.

You must notify Acas if you want to take your case to an employment tribunal.

Tracked changes	
Page number	Description of change made