EQUALS TRUST

Whistleblowing Policy

Version control

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Author/Reviewer:	Tara Cook – Head of HR 01.10.2026

Introduction

Equals Trust is committed to conducting our service provision with honesty and integrity, and we expect employees and third parties working or volunteering in our schools to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct.

A culture of openness and accountability is essential in order to prevent such situations from occurring or to address them when they do occur.

Policy Aims

- To encourage staff or other stakeholders to report suspected wrongdoing by our staff, volunteers or third parties as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;

- To provide staff or other stakeholders with guidance as to how to raise those concerns;

- To reassure staff or other stakeholders that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

  This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work. Whistleblowing may also relate to Safeguarding concerns and should be reported in line with whistleblowing procedures.

Safeguarding Concerns

Please refer to the Trust Child Protection Policy and Managing Allegations of Abuse Against Staff policy for further details regarding Safeguarding concerns. If you are not able to raise concerns internally you can report concerns to the NSPCC whistleblowing helpline 0800 0280285 or email help@nspcc.org.uk

Low Level Concerns

A low-level concern any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns refer to behaviour on the part of a staff member, volunteer or third party such as supply teachers or contractors towards pupils that is considered inappropriate in line with statutory safeguarding advice and/or the Staff Code of Conduct and Child Protection Policy.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. **This threshold is defined as accusations that an adult has**:

• Behaved in a way that has harmed a child or may have harmed a child.
• Possibly committed a criminal offence against, or related to, a child.
• Behaved towards a child in a way that indicates they may pose a risk of harm to children.
• Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

For any concerns that meet the threshold the Child Protection Policy should be followed and concerns reported to the Designated Safeguarding Lead or the Deputy Safeguarding Lead as soon as possible.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. Trust schools will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

Sexual harassment and whistleblowing

A disclosure concerning sexual harassment may amount to a qualifying disclosure under whistleblowing law. This includes information indicating that sexual harassment has occurred, is occurring or is likely to occur. For a disclosure to attract whistleblowing protection, the individual must reasonably believe that the information disclosed tends to show sexual harassment and that raising the concern is in the public interest. An individual who makes a protected disclosure about sexual harassment is protected from suffering detriment as a result of raising the concern and, where they are an employee, from dismissal for doing so. Concerns about sexual harassment may also be raised under the Trust's relevant harassment, grievance or safeguarding procedures, as appropriate. The Trust will consider the nature of the concern and ensure that it is dealt with under the appropriate procedure, recognising that in some circumstances more than one procedure may apply.

What is whistleblowing?

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

(a) criminal activity;
(b) miscarriages of justice;
(c) danger to health and safety;
(d) damage to the environment;
(e) failure to comply with any legal or professional obligation or regulatory requirements;
(f) financial fraud or mismanagement;
(g) negligence;
(h) breach of our internal policies and procedures;
(i) conduct likely to damage our reputation;
(j) unauthorised disclosure of confidential information;
(k) the deliberate concealment of any of the above matters.
(l) something that makes you feel uncomfortable in terms of known standards;
(m) something not in keeping with the school's regulations and policies;
(n) something that falls below established standards of practice; or
(o) improper behaviour
(p) allegations of child safeguarding/abuse concerns in that an individual may not be suitable to work with children (applies to all Trust staff, agency workers or volunteers).

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-Harassment and Bullying Policy as appropriate. If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer (contact details are set out at the end of this policy). However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer directly.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a work colleague or trade union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy. Where concerns relate to allegations of safeguarding concerns/abuse we may not be able to maintain confidentiality due to safeguarding procedures. See EQT child protection policy and the managing allegations of abuse policy.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

The independent whistleblowing charity ‘Public Concern at Work’, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Third Party Concerns

Whistleblowing concerns may relate to the conduct of our employees, supply teaching staff, other supply staff, volunteers or contractor and they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager, head teacher or CEO of the Trust, or one of the other individuals set out below for guidance.

Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information. In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts below. Alternatively, you may contact the chair of governors or CEO of the Trust. Contact details are set out at the end of this policy.

Protection and support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken. You should not suffer any detrimental treatment as a result of raising a concern in good faith.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against Whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

Contacts

Whistleblowing Officer: Catherine Cox, Trust Compliance Manager:
governanace@equalstrust.org or telephone 0115 9143211

CEO: Jenny Cook: jenny.cook@equalstrust.org or telephone 0115 9143211

Chair of the Trust Board: Peter Foale chair@equalstrust.org

External Auditors:

Forvis Mazars LLP

https://www.forvismazars.com/uk/en

Email – david.hoose@mazars.co.uk
Phone – 07552 007 708

Public Concern at Work (Independent whistleblowing charity) Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk

All safeguarding concerns you become aware of whilst working in school (as a paid member of staff, volunteer or supply member of staff or through an agency or contractor) must be reported immediately the designated safeguarding officer. If, in exceptional circumstances, you are not able to raise concerns internally you can report concerns to the NSPCC whistleblowing helpline 0800 0280285 or email help@nspcc.org.uk