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Central Policy:	Trust-wide, applicable at trust and school levels. Schools may not make any changes or adaptations

Whistleblowing Policy

To be the best we can be for ourselves and others

Belonging, Believing, Building

Approved by:	**Board of Trustees**
Date:	**October 2026**
Next review date:	**31 March 2029**

Adopted by school:	**Bampton CE Primary School**
Date:	**November 2027**

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Introduction

All schools and academy trusts are required to have appropriate procedures in place for handling whistleblowing and for ensuring school staff know who they can contact if they wish to raise a concern.

This document explains the types of concerns that can be raised under this procedure, the legal protection for whistle-blowers and how whistleblowing concerns will be handled.

This procedure should be followed for any whistleblowing matters raised by employees of the school, supply staff, agency workers or employees in the central team.

Policy Statement

ODST and its member schools are committed to the highest possible standards of:

- Openness and inclusiveness
- accountability and
- integrity.

Aim of Procedure

This policy aims to:

- 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,
- Let all staff in the trust know how to raise concerns about potential wrongdoing in or by the trust,
- Set clear procedures for how the trust will respond to such concerns, ensuring that staff know that concerns raised by whistle-blowers will be responded to properly and fairly,
- Let all staff know the protection available to them if they raise a whistle-blowing concern,
- 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 – see section 6 below),
- Ensure staff know that they are protected by law and that a non-disclosure agreement, confidentiality clause or 'gagging clause' in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest.
- This policy does not form part of any employee's contract of employment and may be amended at any time.
- This policy applies to all employees, officers and trustees. Other workers, including consultants, contractors, agency staff and those on work placements, are also encouraged to use it.

Legislation

The requirement to have clear whistle-blowing procedures in place is set out in the Academy Trust Handbook. This policy has been written in line with the above document, as well as government guidance on whistle-blowing. We have also taken into account the Public Interest Disclosure Act 1998.. This policy complies with our funding agreement and articles of association.

What is Whistleblowing?

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistle-blowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Sexual harassment (in effect from 6 April 2026)
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above. These concerns should be reported under this policy and can be made by anyone.

Not all concerns about the trust, or individual schools in the trust, count as whistle-blowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

If a complaint involves personal circumstances alongside wider concerns (e.g. pupil health and safety), the staff member must consult with their line manager to decide the most appropriate reporting procedure.

When staff have a concern, they should consider whether it would be better to follow our staff grievance or complaints procedures.

Protect (formerly Public Concern at Work) has: Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure, and a free and confidential advice line.

Procedure for raising a whistleblowing concern

When to raise a concern

Staff should consider the examples in section 3 when deciding whether their concern is of a whistle-blowing 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.

Who to report to

Concerns can be raised at Trust level (see Annex 1 for contact details) or locally to your line manager, Headteacher or the LGB Chair.

If you wish to report the matter to someone outside of the school/ Trust, you can contact one of the external bodies/organisations listed in Annex 2.

Reporting concerns to the media, in most cases will lead to the loss of your whistleblowing law rights.

How to raise the concern

Concerns should be made in writing wherever possible. They should include the 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.

Staff are encouraged to give their name when reporting an allegation, to help the trust take the investigation further. However, a complainant's right to anonymity will be respected.

A proper investigation may be more difficult or impossible if further information cannot be obtained from the staff member. This will also make it more difficult to establish whether any allegations are credible.

Staff who are concerned about possible reprisals if their identity is revealed should consult with one of the central contacts listed in Annex 1 so that appropriate measures can be taken to protect confidentiality where possible.

Trust response for responding to a whistleblowing concern

Investigating the concern

When a concern is received by the Trust, it will:

- 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
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent that the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 of this policy)

- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
    - The recipient should then arrange a further investigation into the matter, as appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police.
    - 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
- Within 10 working days – excluding periods of trust/school closure – of a concern being referred, the Trust will write to the complainant to:
    - Acknowledge that the concern has been received
    - Indicate how the matter is to be dealt with
    - Give an estimate of how long it will take to provide a final response, informing the complainant as to whether any initial enquiries have been made
    - Tell the staff member whether further investigations will take place and if not, why not

Throughout any investigation, the trust will provide well-being check-ins for both the complainant and the subject(s) of a concern. Where appropriate, support and signposting to manage expectations, protect emotional wellbeing and maintain professional confidence will be offered.

Outcome of the investigation

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 or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority (LA) or police.

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.

Beyond the immediate actions, the CEO, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

While we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with one of the contact points listed in section 4.2.

Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made with the reasonable belief that the disclosure is in the public interest and meets the definition of whistle-blowing as listed in section 3, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

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.

Escalating concerns beyond the trust

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 here.

It is advised that staff seek advice before reporting a concern to an external body. The Protect advice line, linked to earlier in this policy, can help staff when deciding whether to raise the concern to an external party.

Review and Reporting of the Procedure

This procedure will be regularly reviewed by the Board of Trustees of ODST to ensure that it continues to remain compliant and meets the needs of Schools and those working in schools.

Annex 1 - Contact List for ODST

If you wish to report the matter to someone within the Trust but outside of the ODST school, please contact one of the following:

Name	Contact
Mark Jones/ Alison McBride- HR team	odst.whistleblowing@oxford.anglican.org 01865 208217
Chair of Estates & Safeguarding Committee - Trustee	

Annex 2 External Organisations

You can blow the whistle to an external organisation rather than your employer. The list below documents some of the prescribed people or bodies that you can go to. Please choose the correct one for your concern. A full list can be found online at Gov.uk: Whistleblowing: list of prescribed people and bodies - GOV.UK

Some of the bodies that may be relevant for school's staff are:

Name	Contact
Ofsted	Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 0300 123 1231 Email: whistleblowing@ofsted.gov.uk
Office of Qualifications and Examinations Regulation	Casework Manager, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry CV5 6UB Tel: 0300 303 3346 Email: Public.Enquiries@ofqual.gov.uk Online reform form: www.ofqual.gov.uk/complaints-and-appeals/whistleblowing/
National Society for the Prevention of Cruelty to Children (NSPCC)	The NSPCC Whistleblowing Advice Line is for anyone with child protection concerns in the workplace. The helpline provides support and advice to those who feel unable to get a child protection issue addressed by their employer. It can be contacted anonymously on 0800 028 0285.
Health and Safety Executive	Tel: 0800 029 4386 Online form: http://www.hse.gov.uk/contact/raising-your-concern.htm Web: www.hse.gov.uk
The Local Government Ombudsman	Address: PO Box 4771, Coventry. CV4 0EH Web: www.lgo.org.uk Tel no. 0300 061 0614
Data Protection and Freedom of Information	The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, SK9 5AF Tel: 0303 123 1113 Email: casework@ico.gsi.gov.uk