

## WHISTLEBLOWING POLICY

<b>Responsible</b>	CEO
<b>Approved by</b>	Board of Trustees
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# WHISTLEBLOWING POLICY

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## Purpose

Better Futures Multi Academy Trust is committed to being a deliberately developmental organization where transparency, respect, probity and high ethical standards underpin everything we do. We believe that creating a culture where everyone feels safe to speak up makes us stronger and helps us learn and improve continuously.

This policy provides all employees and workers with clear routes for raising genuine concerns about suspected wrongdoing, malpractice, or breaches of law. We value disclosures made in good faith and see them as opportunities to address issues early and improve our practices across the Trust.

## The Policy

### 1. Introduction

1.1. This policy relates to conduct known as ‘whistleblowing’ where under the Public Interest Disclosure Act workers may be protected when they raise concerns relating to:

- conduct which is an offence or a breach of the law;
- disclosures related to miscarriage of justice;
- health and safety risks, including risks to the public as well as other employees;
- the abuse of a vulnerable person;
- damage to the environment;
- the unauthorised use of public funds;
- misreporting of performance information; • possible fraud and corruption;
- other unethical conduct.

1.2. BFMAT actively encourages all workers to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. Speaking up is valued and contributes to our continuous improvement as a Trust.

1.3. The policy is primarily for concerns where the interests of others or the MAT itself is at risk and there is a public interest in workers making the disclosure, as laid out in paragraph 1.1. If concerns are about a workers own personal employment position, then its more likely that another policy would be more appropriate. Local Academy HR Managers can advise on the best route – if there is any doubt workers should still raise their concerns.

**When to use this policy:** This policy is for concerns where the interests of others, students, or the Trust itself are at risk and there is a public interest in making the disclosure. This typically involves systemic issues, illegal activity, or matters affecting multiple people.

**When to use other policies:** Personal Employment issues, bullying or harassment you’re experiencing, concerns about a specific student are all examples where other

policies might be more suitable.

If in doubt speak to your local People Operations Manager or still raise your concern under this policy – we would rather staff speak up than remain silent.

1.4. This policy balances our commitment to an open culture with protection for workers against vexatious or malicious allegations. Making a disclosure in good faith means you genuinely believe the information is true and are raising it in the public interest, even if it later proves to be incorrect.

1.5. This policy applies to all employees of the Trust, including apprentices, casual workers, agency workers, contractors, volunteers, and former employees.

## **2. Protected Disclosures**

2.1. The law protects workers who, out of a sense of public duty, want to reveal suspected wrongdoings or malpractice.

2.2. The law allows workers to raise what it defines as a 'protected disclosure'. In order to qualify as a protected disclosure, a disclosure must:

- It must relate to one of the specific matters listed in section 1.1
- It must be made in an appropriate way (see section 3)
- You must reasonably believe it is made in the public interest
- It must consist of information (not merely allegations)

2.3. Workers making a disclosure can expect their matter to be treated confidentially. Your name will not be disclosed to anyone implicated in the suspected wrongdoing without your prior approval, except where:

- You give written consent
- There is a legal obligation to do so
- It becomes necessary to conduct a fair investigation (we will discuss with you first)

2.4. BFMAT will ensure that reports, recommendations, or documentation produced do not identify you without your written consent or legal obligation.

2.5. No formal disciplinary action will be taken against a worker on the grounds of making a disclosure under this policy. You will not suffer dismissal, informal pressure, victimisation, or any detrimental action for making a disclosure in good faith.

2.6. Making a malicious, vexatious, or knowingly false disclosure may result in disciplinary action. However, you will remain protected even if your concern proves to be unfounded, provided you genuinely believed it and raised it in good faith.

2.7. If any colleague threatens, bullies, pressurises or victimises you for making a disclosure, this will be treated as a serious disciplinary matter. This protection continues even after you leave employment with the Trust.

## **3. How to make a disclosure**

- 3.1. **First step - your line manager:** If you have a concern about malpractice, promptly disclose the details to your line manager, preferably in writing or followed up in writing.
- 3.2. **College level – Chief People Officer or Principal:** If it's not appropriate to raise the issue with your line manager (for example, they are implicated or you feel unable to approach them), raise it with the Chief People Officer or Principal.
- 3.3. **Trust level - CEO or Chair of Trustees:** If you feel unable to raise the issue within your college, or if college-level action hasn't resolved your concerns, contact the CEO or Chair of Trustees.
- 3.4. **Concerns about CEO or Chair:** If your disclosure relates to the CEO or Chair of Trustees, raise it with the Company Secretary, who will ensure it reaches the appropriate trustee.
- 3.5. **What information to provide:** When making a disclosure, include as much detail as possible:
  - The nature of your concern and why it worries you
  - Background information and relevant dates
  - Names of individuals involved (where known)
  - Any evidence or documentation you have
  - Whether you've raised this concern before and what happened

You should provide factual information rather than unsubstantiated allegations. If you don't have all the facts, explain what you do know and why you believe there may be wrongdoing, preferably in writing via email.

- 3.6. **What happens next:** The person receiving your disclosure will acknowledge receipt within 5 working days and will:
  - Consider the nature of your concerns
  - Decide on the most appropriate course of action
  - Inform you of the next steps
  - Discuss how you wish to be kept informed

## External Disclosure

- 3.7. This policy aims to provide sufficient reassurance so that disclosures can be raised internally. However, you have the right to make a disclosure to an external 'prescribed person' where there are reasonable grounds to do so and in accordance with the law.
- 3.8. Prescribed persons include regulators and professional bodies relevant to your concern (e.g., Ofsted for education matters, HSE for health and safety, ICO for data protection). The full current list is at:  
  
<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>
- 3.9. You can also make disclosures on a confidential basis to a practicing solicitor or barrister.

3.10. Making a disclosure to the media or on social media without first raising concerns internally (or with a prescribed person) may not be protected under whistleblowing law and could breach confidentiality obligations. Please seek advice before taking this step.

#### **4. Further Assistance**

4.1. BFMAT will not tolerate harassment or victimisation of workers who make disclosures. If at any stage you feel subject to informal pressure, bullying or harassment due to making a disclosure, raise this immediately in writing to the CEO, Chair of Trustees, or Company Secretary as appropriate.

4.2. **Independent advice:** For free, confidential advice on whistleblowing, contact the charity Protect:

- Whistleblowing Advice Line: 020 3117 2520
- Website: <https://protect-advice.org.uk>