

The Willows School Academy Trust



Whistleblowing Policy

Reviewed: September 2026

Next Review: September 2027

Policy status and responsibility

Policy owner	Board of Trustees
Approved by	Board of Trustees
Approval and effective date	September 2026
Review date	September 2027, or sooner following a relevant change
Publication	Trust website and staff policy system

Purpose and commitment

The Willows School Academy Trust is committed to the highest standards of integrity, accountability and safeguarding. This policy enables workers to raise genuine concerns about wrongdoing in the public interest, explains how concerns will be handled and confirms the protection available to those who speak up appropriately.

The Board of Trustees will ensure that concerns are taken seriously, considered promptly, handled fairly and addressed by a person who is sufficiently independent of the matters raised. No worker will be subjected to dismissal, victimisation, harassment or any other detriment for making a protected disclosure.

This policy has regard to the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998; Keeping Children Safe in Education 2026; the Academy Trust Handbook 2025 and the Department for Business and Trade whistleblowing guidance for employers published in April 2026.

Scope

This policy applies to employees, former employees, agency workers, trainees and other workers who fall within the statutory definition of worker. Contractors and volunteers are also encouraged to use the procedure, although they may not have the same statutory protection as workers. The Trust will not tolerate retaliation against any person who raises a genuine concern.

Parents, carers, pupils and members of the public should normally use the Trust's Complaints Policy. A personal complaint about an individual's own employment should normally be raised under the Grievance Policy. Where a concern also contains information about wrongdoing in the public interest, the whistleblowing aspects will be considered under this policy.

What is whistleblowing

Whistleblowing is the disclosure by a worker of information which they reasonably believe shows that wrongdoing has occurred, is occurring or is likely to occur and that raising it is in the public interest. A qualifying disclosure may concern:

- a criminal offence, including fraud, theft, bribery or corruption
- a failure to comply with a legal or regulatory obligation
- a miscarriage of justice
- a danger to the health or safety of any person
- damage to the environment
- sexual harassment
- safeguarding failures, poor or unsafe safeguarding practice, or a failure to act on concerns about a child

- financial malpractice, misuse of public funds or improper use of Trust assets
- abuse of authority, serious conflicts of interest or serious breaches of professional conduct
- the deliberate concealment of information tending to show any of the above

The worker does not need to prove the wrongdoing. They must reasonably believe, based on the information available to them, that the information tends to show relevant wrongdoing and that raising it is in the public interest. Additional legal conditions may apply to external disclosures.

Safeguarding concerns

Safeguarding concerns must never be delayed while deciding which policy applies. If a child is in immediate danger, staff must call 999 and follow the Child Protection and Safeguarding Policy. Concerns about a child's welfare should be reported promptly to the Designated Safeguarding Lead or a deputy.

Where the concern is about poor or unsafe safeguarding practice, a systemic failure, concealment, or the way a safeguarding concern is being handled, staff may use this whistleblowing procedure. All staff and volunteers must feel able to raise such concerns and must know that senior leaders will take them seriously.

A safeguarding concern or allegation that a member of staff, supply staff member, trainee teacher, volunteer or contractor may have harmed a child, committed a criminal offence against a child, posed a risk of harm or indicated they may be unsuitable to work with children must be reported immediately to the Headteacher. A concern about the Headteacher must be reported to the Chair of Trustees. Where there is a conflict of interest in reporting to the Headteacher, the concern should be reported directly to the Local Authority Designated Officer. Low-level concerns must be reported under the Low-Level Concerns Policy.

How to raise a concern internally

A concern may be raised verbally or in writing. Workers are encouraged to raise concerns as soon as possible and may contact either of the Trust's designated whistleblowing contacts:

Staff contact

Headteacher - Malcolm Shaw

The Willows School Academy Trust, Stipularis Drive, Hayes, Middlesex UB4 9QB

Telephone: 020 8841 7176

Trustee contact

Chair of Trustees - Bal Grant

The Willows School Academy Trust, Stipularis Drive, Hayes, Middlesex UB4 9QB

Telephone: 020 8841 7176

If the concern relates to the Headteacher, it should be raised with the Chair of Trustees. If it relates to the Chair, it should be raised with the Vice-Chair or another unconflicted trustee. If both designated contacts are implicated, or there is another material conflict of interest, the concern may be raised with an appropriate external body.

A written disclosure should, where possible, identify that it is being made under the Whistleblowing Policy and provide:

- the nature of the suspected wrongdoing and why it is of concern
- relevant dates, locations and the people involved

- any witnesses or supporting information
- whether the matter has previously been raised and what happened
- how the person raising the concern can be contacted, unless they wish to remain anonymous

Workers should not investigate the matter themselves, interview witnesses or attempt to obtain information to which they do not have legitimate access. They should preserve relevant information already lawfully in their possession.

Confidential and anonymous disclosures

The Trust will take reasonable steps to protect the identity of a person who asks for confidentiality and will share information only with those who need it to assess, investigate or act on the concern. Absolute confidentiality cannot be guaranteed, for example where disclosure is required by law, necessary to protect a child or another person, or required for a fair process. Where identity may need to be disclosed, the Trust will normally discuss this with the whistleblower first, unless it is not lawful or safe to do so.

Anonymous concerns will be considered. However, anonymity may make it more difficult to investigate the concern, assess its credibility, provide protection or give feedback. A person reporting anonymously should provide as much detail and supporting information as possible.

How concerns will be handled

The person receiving a disclosure will handle it sensitively and will not promise a particular outcome. Subject to urgency and complexity, the Trust will normally:

1. Acknowledge the concern within five working days, where contact details are available.
2. Carry out an initial assessment to determine the nature of the concern, any immediate protective action and the appropriate procedure or external referral.
3. Appoint an impartial and suitably competent investigator who has no material conflict of interest, where an investigation is required.
4. Agree appropriate contact arrangements and provide proportionate updates, normally at least every 20 working days while the matter remains open.
5. Keep a secure written record of the disclosure, assessment, decisions, investigation and action taken.
6. Tell the whistleblower when the matter is concluded and provide as much feedback as is lawful and appropriate.

The Trust may refer the matter to the police, children's social care, the Local Authority Designated Officer, the Department for Education, the Disclosure and Barring Service, the Teaching Regulation Agency, the Charity Commission, auditors or another regulator. A referral may be made without the whistleblower's consent where this is necessary to meet a legal or safeguarding duty.

The outcome may include no further action, informal corrective action, a formal investigation, disciplinary or capability action, referral to an external authority, changes to systems or controls, training, or another proportionate response. Information about another person's disciplinary or confidential employment matters will not normally be disclosed.

Support and protection

A worker may seek advice from their trade union, professional association, legal adviser or Protect. They may be accompanied by a trade union representative or workplace colleague at

meetings under this procedure where this is reasonable and does not compromise the investigation.

The Trust will not tolerate retaliation, threats, bullying, harassment, exclusion, damage to career prospects or any other detriment arising because a worker has raised a protected disclosure. Any suspected retaliation should be reported immediately to the Headteacher or Chair of Trustees and may be dealt with under the Disciplinary Policy.

The statutory protection does not depend on the concern being upheld. A concern that proves mistaken or unsubstantiated will not lead to disciplinary action where the worker had a reasonable belief in the information disclosed. Knowingly making a false statement or acting maliciously may be dealt with under the Disciplinary Policy, following a fair process.

If the person remains dissatisfied

A person who reasonably believes that their concern has not been addressed appropriately should first raise this with the person managing the disclosure or, where appropriate, the Chair or Vice-Chair of Trustees. They may also seek independent advice and consider making a disclosure to an appropriate prescribed person or regulator. Legal protection for external disclosures depends on the circumstances and the route used, so independent advice should be obtained where possible.

External reporting and advice

Safeguarding whistleblowing advice

NSPCC Whistleblowing Advice Line

Telephone: 0800 028 0285

Hours: 8am to 8pm Monday to Friday and 9am to 6pm at weekends

Email: help@nspcc.org.uk

This route is available where staff do not feel able to raise child protection failures internally or are concerned about how a safeguarding concern is being handled.

Department for Education

Employees and volunteers with knowledge of an academy may make a whistleblowing disclosure directly to the Department for Education using the Customer Help Portal. The guest option may be used for an anonymous disclosure.

Website: <https://customerhelpportal.education.gov.uk/>

Independent advice

Protect, formerly Public Concern at Work, provides free and confidential whistleblowing advice.

Telephone: 020 3117 2520

Website: <https://protect-advice.org.uk/>

Suspected fraud against the London Borough of Hillingdon

Where information concerns suspected fraud against the Council, it may be reported to Hillingdon Council's Counter Fraud Team. This is a fraud-reporting route and is not the general external route for academy whistleblowing.

Telephone: 0800 389 8313

Email: fraud@hillington.gov.uk

Website: <https://www.hillingdon.gov.uk/reportfraud>

Depending on the subject of the concern, other prescribed bodies may include Ofsted, the Health and Safety Executive, the Information Commissioner's Office, the Equality and Human Rights Commission, the Charity Commission or another body listed by the government. The disclosure must fall within the body's prescribed remit.

Records data protection and monitoring

Records will be processed in accordance with data protection law and the Trust's Data Protection Policy. Access will be restricted to those who need the information. Records will be retained in accordance with the Trust's retention schedule and any applicable safeguarding, employment, regulatory or legal requirements.

The Board of Trustees will receive appropriate anonymised information about the number and nature of disclosures, how they were handled, outcomes, response times and any recurring themes. Reporting must not identify whistleblowers or subjects unnecessarily. The Board will review the effectiveness of this procedure at least annually.

Training publication and review

The Trust will publish this policy on its website and ensure that all staff know how to access it, who the designated contacts are, what protection is available and how concerns will be managed. Whistleblowing and safeguarding escalation routes will be included in induction and refreshed through staff training.

The Board of Trustees will review this policy annually and sooner where legislation, statutory guidance, governance arrangements or contact details change. The policy should be read alongside the Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-Level Concerns Policy, Allegations Against Staff Procedure, Grievance Policy, Complaints Policy, Disciplinary Policy and Data Protection Policy.

Approval

Malcolm Shaw
Headteacher

Bal Grant
Chair of Trustees

September 2026