



Special Partnership Trust

WHISTLEBLOWING POLICY

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Important safeguarding message: Nothing in this policy replaces the requirement to take immediate safeguarding action. If a child is at immediate risk of harm, staff must follow the [Trust's Safeguarding and Child Protection Policy](#) and contact the emergency services where necessary.



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Whistleblowing Policy

1. Introduction

The Special Partnership Trust is committed to the highest possible standards of openness, integrity, accountability and safeguarding. The Trust seeks to maintain a culture in which everyone working in or with the Trust feels able to speak up safely about suspected wrongdoing, risk or unsafe practice.

Workers are often the first people to identify that something may be wrong. Information raised through this policy can help the Trust to protect children and adults, safeguard public money, prevent harm, improve practice and meet its legal and regulatory responsibilities.

Employees are expected to report safeguarding concerns, unlawful activity, fraud, corruption or other serious wrongdoing where they become aware of it through their work. A deliberate failure to report concerns where there is a professional or statutory duty to do so may be considered under the appropriate disciplinary procedure.

The Trust will take concerns seriously, consider them objectively and respond in a fair and proportionate manner. A person raising a concern does not need to prove the matter. The fact that a concern is not upheld following investigation does not mean it was inappropriate to raise it.

No person should suffer retaliation, victimisation, discrimination, harassment or any other disadvantage because they have raised a concern reasonably under this policy, supported another person in raising a concern, or participated in an investigation.

Guy Chappell, Chief Executive Officer, is the Trust's Whistleblowing Officer. Alison Cook, Chair of Trustees, is the Trust's Whistleblowing Trustee and provides independent oversight of the policy.

The requirement to have clear whistleblowing 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 whistleblowing](#). We also take into account the [Public Interest Disclosure Act 1998](#) and the statutory guidance issued in

[Keeping Children Safe in Education \(KCSIE\)](#). This policy complies with our funding agreement and articles of association.

2. Scope and legal status

This policy applies across all Trust schools, settings, alternative resource bases and central services.

It may be used by employees, workers, agency workers, apprentices, trainees and others who may fall within the statutory definition of a worker. The Trust will also receive and consider concerns from volunteers, contractors, consultants, governors, trustees, job applicants, former workers, parents, carers and members of the public, although statutory whistleblowing protection does not automatically extend to everyone in these groups.

This policy does not form part of any contract of employment or other contract to provide services. It may be amended following appropriate consultation.

This policy operates alongside applicable contractual and collective rights, including those arising under the STPCD, Burgundy Book, Green Book and relevant NJC provisions. These arrangements do not replace or limit statutory whistleblowing protections.

3. Definition of whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or danger at work.

For a disclosure to qualify for statutory protection, a worker must generally have a reasonable belief that the disclosure is in the public interest and tends to show one or more of the following:

- a criminal offence has been, is being or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of an individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged; or
- information relating to any of the above has been or is likely to be deliberately concealed.

Examples may include:

- fraud, bribery, corruption or financial irregularity;
- misuse of public money or Trust resources;
- serious breaches of law, regulation or statutory guidance;
- danger to the health, safety or welfare of any person;
- abuse, neglect or harm to a child or vulnerable adult;
- serious safeguarding failures or unsafe safeguarding practice;
- unlawful discrimination, harassment or serious misconduct;
- serious data protection or confidentiality breaches; or
- attempts to conceal any of the above.

The person raising the concern does not need to identify the precise legal category into which the concern falls. The Trust will assess the information provided and determine the appropriate process.

If a member of staff is uncertain whether something is within the scope of this policy they should seek advice from the Whistleblowing Officer or the Trust HR team, whose contact details are at the end of this policy.

Protect (<https://protect-advice.org.uk>) is a registered charity which advises on serious malpractice within the workplace in accordance with the provisions of the Public Interest Disclosure Act 1998, has free and confidential advice line (details can be found at the end of this policy).

4. Whistleblowing, grievances and other concerns

4.1 Personal employment concerns

Not every concern about the Trust will amount to whistleblowing. A matter affecting a worker personally, such as an individual disagreement about pay, workload, working arrangements, treatment by a manager or an employment decision, will normally be considered under the Grievance Policy or another appropriate employment procedure.

However, a concern may include both a personal element and a wider public-interest issue. For example, an individual complaint about discriminatory treatment may also indicate systemic unlawful practice affecting other workers. The Trust will consider the substance of the concern rather than rejecting it solely because the person raising it is also personally affected.

4.2 Other procedures

Where appropriate, different elements of a concern may be considered under different procedures. The Trust will explain which procedure or procedures will be used and, so far as reasonably possible, avoid unnecessary duplication.

The use of another procedure will not remove a worker's statutory whistleblowing protection where the legal requirements for a protected disclosure are met.

The raising of a whistleblowing concern will not prevent the Trust from addressing unrelated conduct, attendance, safeguarding, capability or performance matters through the appropriate procedures. Equally, those procedures will not be used as a substitute for properly considering a whistleblowing disclosure.

5. Raising a concern

Concerns should be raised as soon as reasonably practicable. Early reporting can assist the Trust to protect people, preserve evidence and prevent further harm.

A person does not need to wait until harm has occurred and does not need conclusive evidence. The person should have a reasonable basis for the concern and should provide the information available to them.

A person raising a concern will not be required to investigate the matter personally, confront anyone involved or obtain evidence to which they do not have lawful access.

If the concern involves an immediate danger to a child or another person, staff must take immediate action under the relevant safeguarding or emergency procedure rather than waiting for the whistleblowing process.

A concern may be raised verbally or in writing. It may be raised in person, by telephone, by email, during an online meeting or through another accessible communication method.

Where possible, the person raising the concern should include:

- the nature of the suspected wrongdoing;
- relevant dates, locations and people involved;
- how and when the concern came to their attention;
- whether the concern has previously been raised and, if so, with whom;
- any relevant documents or information lawfully available to them;
- any immediate risk to a child, adult, public funds, evidence or Trust

- operations; and
- how the Trust can contact them.

The absence of any of this information will not prevent the Trust from considering the concern.

5.1. Reporting routes

Concerns should normally be raised through the reporting routes set out in Appendix 1. A person is not required to report a concern to anyone who is implicated in the matter, has a conflict of interest, or whom they reasonably believe may not act independently.

Concerns may also be raised collectively. Each person's position and confidentiality preferences will be considered individually.

5.2. Support and accessibility

The Trust will take reasonable steps to ensure that this procedure is accessible and inclusive. A person raising a concern should tell the Trust if they require:

- a reasonable adjustment connected with disability or health;
- information in an alternative format;
- an interpreter or communication support;
- additional time or breaks during meetings;
- a remote rather than face-to-face meeting;
- support connected with pregnancy, maternity, religion or belief; or
- another appropriate arrangement to enable effective participation.

A worker may be accompanied at formal meetings held under this procedure by a recognised trade union representative or workplace colleague. The Trust may agree another companion as a reasonable adjustment or where this would assist participation.

6. Child safeguarding and concerns about adults

6.1 Concerns about a child's welfare

All staff have a responsibility to safeguard children and to act where they believe a child is suffering or is likely to suffer harm.

A concern about a child must be reported immediately in accordance with the Trust's Safeguarding and Child Protection Policy. A safeguarding concern must not be delayed while a person considers whether it also amounts to

whistleblowing.

Whistleblowing may be appropriate where there is a concern about:

- poor or unsafe safeguarding practice;
- a failure to follow child protection policies or statutory guidance;
- a failure to act on a safeguarding concern;
- deliberate concealment of an allegation or safeguarding incident;
- pressure on staff not to report or record concerns;
- repeated failures in supervision, care or risk management;
- inappropriate conduct by staff, volunteers, contractors, governors or trustees; or
- a wider organisational culture that may place children at risk.

6.2 Allegations or concerns about adults working with children

Where a member of staff has a safeguarding concern or an allegation is made about an adult working in or on behalf of the Trust, the matter must be reported through the route set out in KCSIE and the Trust's Managing Allegations procedure.

Where the concern relates to the Headteacher, it must be reported to the CEO. Where it relates to the CEO, it must be reported to the Chair of Trustees. Where it relates to the Chair of Trustees, it must be reported to the Vice-Chair or another independent trustee designated by the Board.

The appropriate Local Authority Designated Officer (LADO) must be consulted where the harm threshold may be met. Police, the Disclosure and Barring Service, Teaching Regulation Agency or another relevant body may also need to be contacted.

6.3 Low-level concerns

A concern about an adult's conduct that does not appear to meet the harm threshold may still be a low-level concern and must be shared in accordance with the Trust's Low-Level Concerns Policy and Staff Code of Conduct.

The term "low-level" does not mean insignificant. Sharing apparently minor concerns can assist the Trust to identify patterns of inappropriate or unsafe behaviour.

6.4 Concerns about safeguarding practice

Where staff have concerns about safeguarding practice within the Trust, they should raise them through the Trust's internal whistleblowing arrangements.

Where a person feels unable to raise the matter internally or believes that a genuine safeguarding concern is not being addressed, external routes include local authority children's social care, the police, and the NSPCC Whistleblowing Advice Line, depending on the nature and urgency of the concern.

KCSIE 2026 requires all staff to understand what they should do if they have concerns about safeguarding practice within their school.

7. Assessment and investigation

All whistleblowing concerns will be taken seriously and assessed promptly. The Trust will consider the nature of the concern, any immediate safeguarding, legal, financial or regulatory risks, and determine the most appropriate way to respond. Where necessary, immediate protective or safeguarding action may be taken before a full investigation is commenced.

Whistleblowing concerns relating to a school-based matter will normally be assessed initially by the relevant Headteacher or another appropriate senior leader. Following this initial assessment, the concern may be referred to the Chief Executive Officer, who will determine the most appropriate course of action. Where the concern relates to the Chief Executive Officer, the Chair of Trustees will determine the appropriate arrangements. Appropriate steps will be taken to avoid conflicts of interest and to ensure concerns are considered impartially.

Where further enquiries are required, the Trust may meet with the person raising the concern to clarify matters, obtain additional information and understand any evidence available. The person raising the concern may be accompanied at any formal meeting in accordance with this policy.

The Trust will decide whether the concern should be addressed through the whistleblowing procedure, another Trust procedure, referral to an external agency, or a combination of these. The use of another procedure will not affect any whistleblowing protections that may apply.

Where investigation is required, the Trust will appoint an appropriately qualified and impartial investigator. Investigations may be undertaken by a senior leader, a member of the Trust team, an independent investigator or another suitably

qualified person, depending on the nature and seriousness of the concern. External agencies, including safeguarding, regulatory, professional or law enforcement bodies, may be involved where appropriate.

Investigations will be conducted fairly, objectively and proportionately. Relevant evidence will be gathered and considered, and reasonable enquiries made to establish the facts. The Trust will consider evidence that supports and does not support the concern and will seek to ensure that individuals affected by the process are treated fairly. Any person who is the subject of a concern will normally be given an appropriate opportunity to respond before conclusions are reached, unless safeguarding, legal or regulatory considerations require a different approach.

The Trust will seek to keep the person raising the concern appropriately informed about the progress of the matter, subject to legal, confidentiality, safeguarding and data protection requirements. The amount of information that can be shared may vary depending on the circumstances of the case.

The Trust will progress concerns without unreasonable delay and will aim to conclude most whistleblowing matters within four weeks of receiving the concern. Timescales will depend on the complexity of the concerns raised, the availability of evidence and witnesses, and any involvement of external agencies. Where a matter cannot reasonably be concluded within that timeframe, the Trust will normally provide an update and, where possible, an indication of revised timescales.

7.1 Outcome and feedback

Once the matter has been considered, the Trust will record:

- the concern raised;
- the steps taken;
- the evidence considered;
- any findings reached;
- any external referrals made;
- the outcome;
- any recommendations or corrective actions; and
- any organisational learning.

The person raising the concern will be informed when consideration of the matter has concluded and will receive as much information about the outcome as the Trust can lawfully and appropriately provide.

The Trust may be unable to disclose personal data, confidential employment information, disciplinary action, safeguarding information, legal advice or details that could prejudice another process. This does not necessarily mean that no action has been taken.

Where appropriate, the Trust will review relevant policies, working practices, training, supervision, controls or governance arrangements to reduce the risk of recurrence.

A whistleblowing investigation does not itself determine disciplinary sanctions. Where the findings indicate potential misconduct, the matter will normally be considered under the appropriate disciplinary or professional procedure.

8. Confidentiality and data protection

Concerns will be handled sensitively. Information will be shared only with those who need it to assess, investigate, respond to or provide oversight of the concern, or where disclosure is otherwise required or permitted by law.

The Trust will make reasonable efforts to protect the identity of the person raising the concern where requested.

Absolute confidentiality cannot be guaranteed. It may be necessary to disclose a person's identity where:

- this is required by law;
- an external body requires the information;
- the person is needed as a witness;
- fairness requires the subject of the concern to understand the substance or source of the allegation;
- there is an immediate risk of harm; or
- the matter cannot otherwise be investigated effectively.

Where disclosure of identity is being considered, the Trust will normally discuss this with the person in advance unless doing so would create a risk, undermine an investigation or be prohibited by law.

Personal information will be processed in accordance with data protection legislation, the Trust's Data Protection Policy and its Records Retention Schedule. Information will not be retained for longer than necessary.

9. Anonymous allegations

The Trust encourages people to identify themselves where they feel able to do so because this can make it easier to clarify information, provide support and give feedback. However, anonymous concerns will still be considered.

The Trust will assess an anonymous concern by considering:

- the seriousness and urgency of the issue;
- the level of detail provided;
- whether the information appears credible;
- whether information can be verified from another source;
- the potential risk to children or others;
- the potential risk to public money or Trust operations; and
- whether a proportionate investigation is possible.

An anonymous concern will not be rejected merely because the identity of the person raising it is unknown. However, anonymity may limit the Trust's ability to investigate fully or provide feedback.

10. Unsubstantiated, false or malicious concerns

A person will not face disciplinary or other adverse action simply because a concern raised reasonably is not substantiated.

The Trust will distinguish carefully between:

- a concern raised reasonably that is not substantiated;
- a mistaken or incomplete concern;
- a concern that cannot be determined because evidence is unavailable; and
- a knowingly false allegation made with a malicious or improper intention.

Only where there is evidence that a person knowingly provided false information or acted maliciously may the matter be considered under the appropriate disciplinary or other procedure. The fact that an allegation is not upheld is not, by itself, evidence of malice.

11. Protection and non-retaliation

Workers must not suffer detrimental treatment because they have raised a protected disclosure.

- Detrimental treatment may include:
- dismissal or threat of dismissal;
- disciplinary action;

- intimidation or threats;
- bullying or harassment;
- discrimination;
- reduced work or removal of duties without proper reason;
- denied development or promotion opportunities;
- unfavourable shift, timetable or deployment decisions;
- exclusion from meetings or information;
- damage to professional reputation;
- pressure to withdraw or alter a concern;
- adverse treatment by colleagues, managers, contractors or third parties; or
- any other disadvantage connected with speaking up.

12. Escalation and external disclosures

12.1. Internal escalation

The Trust cannot guarantee the outcome sought by the person raising the concern. However, the Trust will seek to ensure that the concern is assessed fairly and through an appropriate process.

Where a person who has raised a concern believes that it has not been handled appropriately, or that material aspects of the concern have not been adequately considered, they may request that the matter is reviewed by the Whistleblowing Officer. Where the Whistleblowing Officer has already been involved in the matter, the concern may be referred to the Whistleblowing Trustee or another independent trustee designated by the Board.

An internal review will not normally reinvestigate the matter in full but may consider whether the concern has been handled appropriately, whether relevant evidence was considered and whether further action is required.

12.2. External disclosures

This procedure is intended to provide an effective and proportionate internal route for raising concerns. However, there may be circumstances in which a person reasonably believes that the concern cannot be raised internally, has not been addressed appropriately, or should be disclosed to an external body, such as:

- a relevant professional body or regulatory organisation e.g. Ofsted or the ESFA
- the External Auditor
- a relevant voluntary organisation e.g. the NSPCC

- the police

See Appendix 2 for a list of Key Contacts.

12.3. Independent advice

Any person considering raising a concern, escalating a concern or making an external disclosure may seek independent advice before doing so. Sources of advice may include a recognised trade union, professional association, legal adviser, Citizens Advice or Protect, the independent whistleblowing charity.

Seeking advice does not prevent a person from using this policy and does not affect any statutory protections that may apply.

13. Governance, records and review

The CEO is the Trust's Whistleblowing Officer and has operational responsibility for the implementation of this policy. This includes receiving and assessing whistleblowing concerns, determining the appropriate course of action, commissioning investigations where required, ensuring concerns are handled appropriately, and reporting significant matters to the Chair of Trustees and the Board where necessary.

The Chair of Trustees is the Trust's Whistleblowing Trustee and has independent oversight of the Trust's whistleblowing arrangements. This includes providing assurance that concerns are managed fairly, appropriately and in accordance with this policy, reviewing themes and trends, and providing an independent reporting route where concerns relate to the Chief Executive Officer or where an individual reasonably believes that a concern cannot be raised through the normal management structure.

Operational management of a concern may be delegated to the CEO, Trust HR, an appropriate senior leader, an independent investigator or another suitably qualified person, provided conflicts of interest are properly managed.

A confidential central record will be maintained. The Whistleblowing Officer will report appropriate themes, assurance and organisational learning to the Board of Trustees at least annually. Reports will normally be anonymised or aggregated and should include, where appropriate:

- the number and broad nature of concerns;
- handling times;

- external referrals;
- broad outcomes;
- any reported retaliation;
- recurring themes or control weaknesses; and
- resulting improvements.

Serious concerns will be reported sooner where safeguarding, governance, financial, legal or regulatory obligations require this.

The Trust will:

- make this policy readily accessible;
- include whistleblowing arrangements within induction and relevant training;
- ensure staff understand safeguarding reporting routes;
- periodically review staff awareness and confidence;
- monitor whether particular groups experience barriers to speaking up; and
- take proportionate action to improve accessibility and trust in the process.

The policy will be reviewed annually and sooner where there is significant organisational learning or a relevant change to legislation, KCSIE, the Academy Trust Handbook or other statutory guidance.

Appendix 1: Summary of reporting routes

Concern	First reporting route	Alternative or escalation route
Immediate danger or crime in progress	Emergency services	
Immediate concern about a child	DSL or Headteacher	LADO or police
Concern about safeguarding practice	Headteacher or DSL	Whistleblowing Officer or Chair of Trustees
Concern about a school employee	Headteacher	CEO
Concern about the Headteacher	CEO	Chair of Trustees
Concern about central Trust staff	CEO or Trust HR	Chair of Trustees

Concern about the CEO	Chair of Trustees	Vice-Chair or designated independent trustee
Concern about a trustee	Chair of Trustees	Vice-Chair or designated independent trustee
Concern about the Chair	Vice-Chair or designated independent trustee	Appropriate prescribed person or regulator
Concern about financial wrongdoing	CEO, CFO or Whistleblowing Officer	External auditor, DfE or other relevant body
Concern not addressed internally	Whistleblowing Officer	Appropriate prescribed person, regulator, trade union, legal adviser or Protect

Appendix 2: Key contacts

Whistleblowing Officer	Guy Chappell (CEO) 07807495402 GChappell@specialpartnership.org
Whistleblowing Trustee	Alison Cook (Chair of Trustees) acook@specialpartnership.org
Trust HR Team	01872 613115 HR@specialpartnership.org
Protect	020 3117 2520 https://protect-advice.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk
Prescribed persons	Government list of prescribed persons and bodies
Confidential counselling	Simply Health 24 hour helpline 0330 102 5448

	https://www.simplyhealth.co.uk/healthy-living/treatment-guides/counselling
Headteacher - Brunel School	Vikki Alden 01803 665522 admin@brunelschool.org
Headteacher – Castlebridge School	Bridget Williams 01822 851240 enquiries@castlebridge.org.uk
Headteacher – Curnow School	Rob Armstrong 01209215432 secretary@curnowschool.org.uk
Headteacher – Doubletrees School	Heidi Hoskin 01726812757 secretary@doubletrees.org.uk
Headteacher – Lampard Community School	Tamsin Winter 01271 345416 admin@lampard.org.uk
Headteacher – Mill Water School	Sarah Pickering 01395 568890 info@millwater.devon.sch.uk
Headteacher – Nancealverne School	Ruth Carpenter 01736365039 secretary@nancealverne.org.uk
Headteacher – Orchard Manor School	Nicola Jones 01626 862363 admin@orchard-manor.org
Headteacher – Pencalenick School	Joe McGovern 01872 520385 secretary@pencalenick.org