



Leodis
Academies
Trust

WHISTLEBLOWING POLICY

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2.0	September 2023	COO	Revisions made to convert into Trust Format and make reporting process clearer. All sections updated.
3.0	September 2024	COO	Rebranded, reformatted and dates updated. Section 2.6: Reference to radicalisation and terrorism concerns added.
3.1	Nov 2024	COO	Updates made to the name of the Local Governing Board/ Local Advisory Board to reflect the changes to the roles and responsibilities outlined in the Academy Trust Governance Guide 2024.
3.2	July 2025	Trust HR Manager / COO	Updates made to Appointed Whistleblowing Trustee email address. Order in which whistleblowing concerns are to be raised clarified. References to ESFA removed and changed to DfE

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1. INTRODUCTION

- 1.1 Leodis Academies Trust is committed to the highest possible standards of honesty and integrity, and we expect all staff to maintain these standards in accordance with our Code of Conduct. All organisations, however, 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 occurring or to address them when they do occur.
- 1.2 In the first instance, Leodis Academies Trust hopes that employees would feel able to raise concerns through the processes and procedures in place at each Academy. On occasion employees may feel unable to do this and in these instances this policy will apply.
- 1.3 As an employee of the Trust you may be the first to question or realise there may be something seriously wrong within the organisation. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may also fear harassment or victimisation and think it may be easier to ignore the concern rather than report it.
- 1.4 It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that staff can do so without fear of reprisals. It is intended to encourage and enable staff of the Trust to raise serious concerns within each Academy rather than overlooking a problem or discussing it externally.
- 1.5 In addition, the policy provides a means for you to raise a concern under the Public Interest Disclosure Act 1998, which provides you with a certain level of legal protection if you wish to raise legitimate concerns.

2. AIMS AND SCOPE OF THE POLICY

2.1 Aims

- 2.1.1 To encourage staff to report suspected wrongdoing 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.
- 2.1.2 To provide staff with guidance on how to raise concerns.
- 2.1.3 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 2.1.4 There are existing procedures in place to enable you to lodge a grievance relating to your own employment with the Trust.
- 2.1.5 This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures, although the Trust reserves the right to determine which procedure is appropriate.
- 2.1.6 This policy applies to all employees of the Leodis Academies Trust, Trustees, governors, consultants, contractors, casual and agency staff and volunteers (collectively referred to as staff in this policy).

2.2 What is Whistleblowing?

2.2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work.

2.2.2 Concerns to be reported under this policy should relate to something which involves an issue in the public interest and which you have reasonable belief to be true, for example where:

2.2.2.1 A criminal offence has been committed, is being committed or is likely to be committed.

2.2.2.2 A person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject.

2.2.2.3 Unethical behaviour and/ or negligence resulting in a breach of our internal policies and procedures, including our Trust Code of Conduct, has occurred, is occurring or is likely to occur.

2.2.2.4 A miscarriage of justice has occurred, is occurring or is likely to occur.

2.2.2.5 The health and safety of any individual had been, is being or is likely to be endangered.

2.2.2.6 The environment has been, is being, or is likely to be damaged.

2.2.2.7 Bribery, financial fraud or a mismanagement of funds has occurred, is occurring or is likely to occur.

2.2.2.8 A staff member's conduct has damaged, is damaging, or is likely to damage the Trust's reputation or financial wellbeing.

2.2.2.9 Unauthorised disclosure of confidential information.

2.2.2.10 The deliberate concealment of any of the above matters.

2.3 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at 3.1 above (for example, a breach of our internal policies), you should discuss with a member of your Academy leadership team which route is the most appropriate.

2.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from a member of the Academy or Trust's leadership team.

2.5 If your concern is in relation to safeguarding and the welfare of pupils at the Academy, you should consider whether the matter is better raised under the Academy's Safeguarding and Child protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead, although the principles set out in the is policy may still apply.

2.6 If your concern is in relation to radicalisation and terrorism, you should consider whether the matter is better raised under the Academy's Safeguarding and Child Protection policy and in accordance with the arrangements for reporting such concerns, i.e. via the designated safeguarding lead for pupils and Principal/ CEO Principal/ Appointed Whistleblowing Trustee for staff, although the principles set out in the is policy may still apply.

3. STATUTORY GUIDANCE

3.1 This policy is written with consideration to:

- Public Interest Disclosure Act 1998.
- Data Protection Act 2018.
- Freedom of Information Act (2000).
- Employment legislation.
- Employment policies.
- The Enterprise and Regulatory Reform Act 2013.

4. LINKS WITH OTHER TRUST POLICIES

4.1 All Trust Policies are linked with the Whistleblowing Policy.

5. ROLES AND RESPONSIBILITIES

5.1 The Trustees of Leodis Academies Trust

The Trustees have overall responsibility for:

- 5.1.1 Annual review of the policy.
- 5.1.2 Annual report of the effectiveness of the policy.
- 5.1.3 Approving amendments to the policy.

5.2 The Appointed Whistleblowing Trustee

The Whistleblowing Trustee will:

- 5.2.1 Receive any concerns in line with this policy
- 5.2.2 Work with the CEO Principal, Chief Operating Officer (COO) or the Trust HR Manager to investigate matters in line with this policy.

5.3 The CEO Principal

The CEO Principal has overall responsibility for:

- 5.3.1 Maintaining and operating the policy.
- 5.3.2 Ensuring that this policy is communicated Trust Wide.
- 5.3.3 Ensuring that all whistleblowing referrals are managed in line with this Policy.
- 5.3.4 Report as necessary to Trustees.
- 5.3.5 To work with the Appointed Whistleblowing Trustee in line with this policy.

5.4 Local Committee (LC)

The LC has overall responsibility for:

5.4.1 Promoting the policy locally.

5.4.2 Responding to the outcomes of any investigation as required.

5.5 The COO and Trust HR Manager

In collaboration with the HR Trust Manager, the COO has overall responsibility for:

5.5.1 Providing advice and support for whistleblowing matters.

5.5.2 Liaising with the appointed Whistleblowing Trustee as required.

5.5.3 Maintaining a record of concerns raised and the outcomes (but in a form that does not endanger confidentiality).

5.5.4 Maintaining confidentiality.

5.6 Managers/ Leaders

The relevant Academy Manager/ Leader will:

5.6.1 Undertake investigations without any undue delay as directed by the COO or HR Trust Manager.

5.6.2 Maintain confidentiality.

5.7 Employees

Employees must:

5.7.1 Raise issues of concern responsibly in line with this Policy.

5.7.2 Participate in any investigation deemed necessary and as a result maintain confidentiality.

5.8 Others

As an employee or a contractor of the Trust or its Academies or partner organisation, it is recognised that in some cases, you may have concerns which you may want to bring to our attention. The Trust is committed to encouraging all individuals including non-school employees to raise serious concerns with the organisation. While we would seek always to protect the anonymity of individuals raising concerns in good faith, the Whistleblowing Policy does not protect employees of external organisations in the same way as Trust employees.

6. RAISING A WHISTLEBLOWING CONCERN

6.1 The procedure

6.1.1 It is important that you feel comfortable in raising legitimate concerns in the public interest, as this provides each Academy with an opportunity to address the associated issues as

early as possible. The earlier you express the concern, the easier it is to take action. Over time these details can be forgotten, or remembered incorrectly, which can make a concern more difficult to investigate. It would help the Trust if you could make a note of your concerns at the time they arise and let us know about them as soon as possible.

- 6.1.2 Leodis Academies Trust Safer Working Practice Policy also reiterates the need for staff to raise concerns under Whistleblowing legislation.
- 6.1.3 We hope that 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.
- 6.1.4 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, or they are the subject of the complaint, then you can raise the matter in the following order:
 - 6.1.4.1 The Principal.
 - 6.1.4.2 The Trust HR Manager.
 - 6.1.4.3 The COO, as the member of the Trust Executive team who is responsible for managing whistleblowing complaints.
 - 6.1.4.4 The CEO Principal.
 - 6.1.4.5 The Appointed Whistleblowing Trustee.
 - 6.1.4.6 In addition, you may also approach the Chair of your LC, Chair of Trustees, or the Chair of a Trustee Committee. They would, however, pass your concern to the COO in the first instance.
- 6.1.5 Contact details for all of the above are listed at the end of this policy.
- 6.1.6 In the case of a concern being raised about the CEO Principal, concerns raised can be raised in writing or email to the Chair of Trustees.

6.2 **What to expect:**

- 6.2.1 A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 6.2.2 A copy of the written summary of your concern will be provided to you after the meeting. You will also be given an indication of the proposed approach to be using when dealing with the matter.
- 6.2.3 Although you are not expected to prove an allegation, you will need to demonstrate that there are sufficient grounds for your concern. It would be useful to provide relevant information including, where possible, such as:
 - 6.2.3.1 The background and history to the case.
 - 6.2.3.2 The reason why you are particularly concerned.
 - 6.2.3.3 Any specific details available including names, dates, times and places.

6.2.3.4 Details of any particular conversations that support the concerns.

6.2.3.5 Details any personal interest that you may have in the matter.

6.2.3.6 How you think that things may be put right, if possible.

6.2.4 If you are concerned that safeguarding arrangements in the Academy are not effective, or a child/ren is not being protected you should bring the matter to the attention of the Designated Safeguarding Lead, the Principal or Leodis' Safeguarding Lead. If you are unable to do this or are not satisfied with the response you should contact the LADO. (You may refer to the guidance in Safer Working Practice Policy for more information or the contacts at the end of the policy).

6.3 **How the Academy will respond:**

6.3.1 The action taken by each Academy will depend on the nature of the concern. The matters raised may:

6.3.1.1 Be investigated internally (this is the most likely option).

6.3.1.2 Be referred to the Police.

6.3.1.3 Be referred to the external auditor.

6.3.1.4 Form the subject of an independent inquiry.

6.3.1.5 Any combination of the above.

6.3.2 In order to protect individuals and each Academy, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

6.3.3 All referrals made will be treated in the strictest of confidence.

6.3.4 There are special rules surrounding the gathering of evidence. Any attempt to gather evidence by people who are unfamiliar with these rules may adversely affect the outcome of the case as evidence has to be collected in accordance with current legislation. This is of particular importance in regard to surveillance. If the nominated person is unsure about the gathering of evidence, advice is available from the Leodis' retained HR or Health and Safety provider, Trust Finance team and/or the Child Protection Team at Leeds City Council.

6.3.5 Some concerns may be resolved by agreed action without the need for investigation.

6.3.6 Within ten working days of a concern being received, where appropriate, the Academy will write to you:

6.3.6.1 Acknowledging that the concern has been received.

6.3.6.2 Telling you whether further investigations will take place and if not, why not.

6.3.6.3 Indicating how it proposes to deal with the matter, including potential timescales.

6.3.6.4 Telling you whether any initial enquiries have been made.

6.3.7 The amount of contact between the person(s) considering the issues and you, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

6.3.8 When any meeting is arranged, you have the right, if you wish, to be accompanied by a Union or professional association representative or a friend who is not involved in the area of work to which the concern relates.

- 6.3.9 Each Academy will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, each Academy will advise you about the procedure.
- 6.3.10 Each Academy acknowledges the need to provide you with assurance that the matter has been properly addressed. Thus, subject to legal constraints, you will receive appropriate information about the extent and outcomes of any investigations.

7. CONFIDENTIALITY AND DATA PROTECTION

- 7.1 We hope that staff 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.
- 7.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the other contact points listed in paragraph 13 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are given at the end of this policy.
- 7.3 Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable taking into account:
- 7.3.1 The seriousness of the issue raised.
 - 7.3.2 The credibility of the concern.
 - 7.3.3 The likelihood of confirming the allegation from other sources.
- 7.4 As part of the application of this policy, the Trust may collect, process and store personal data in accordance with our data protection policy. A log of all whistleblowing concerns will be kept by the COO. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time in the collecting, holding and sharing of information in relation to our workforce. Records will be kept in accordance with our Workforce Privacy Notice, our Retention and Destruction Policy and in line with the requirements of Data Protection Legislation.

8. EXTERNAL DISCLOSURES

- 8.1 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.
- 8.2 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. Protect holds a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy. Alternatively, the list is available from the Department for Business, Energy & Industrial Strategy (<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies>)

- 8.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a contractor, supplier or service provider. In some circumstances the law will protect you if you raise a concern with the third party directly 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 or one of the other individuals set out in paragraph 4.2 for guidance.

9. INVESTIGATION AND OUTCOME

- 9.1 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 in order to provide further information.
- 9.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. We may in some circumstances, appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing. This will be sent to the Principal/CEO Principal and Chair of Governors/Chair of Trustees for actioning.
- 9.3 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, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 9.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

10. IF YOU ARE NOT SATISFIED

- 10.1 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.
- 10.2 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 in section 13 or seek external advice
- 10.3 Before making an external referral, we would expect that contact has been made with the appropriate person in the Trust to seek advice and would signpost you to the Appointed Whistleblowing Trustee or the Chair of Trustees Contact details are set out at the end of this policy.
- 10.4 If you feel it is right to take the matter further, the following are possible contact points:
- 10.4.1 Relevant professional bodies or regulatory organisations.
 - 10.4.2 Your union.
 - 10.4.3 The Health and Safety Executive (HSE).
 - 10.4.4 The Information Commissioner.
 - 10.4.5 DFE.
 - 10.4.6 Your solicitor.
 - 10.4.7 The Police.
 - 10.4.8 Protect – an independent charity that provides free advice for employees who wish to express concerns about fraud or other serious malpractice. Contact details can be found at the end of this policy.
 - 10.4.9 The Department for Business and Trade: [Department for Business and Trade - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

- 10.5 If you do take the matter outside the Trust, you will need to ensure that you do not disclose confidential information or that disclosure would be privileged. If you have any queries as to what constitutes confidential information, please check with Leodis' HR Team or the Trust COO.

11. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 11.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 11.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. 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 one of the contact people in section 13 immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 11.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue an individual personally for compensation in an employment tribunal.
- 11.4 A confidential support and counselling hotline is available to whistleblowers who raise concerns under this policy. Their contact details are set out at the end of this policy.

12. EQUALITY IMPACT ASSESSMENT

The equality impact assessment of this policy is wholly positive as the policy supports the opportunity to address equality and diversity issues.

13. CONTACTS

13.1 Key contacts:

Academy Principals	Blackgates Primary Academy – Julie Coulson 0113 887 8155 j.coulson@blackgates.leodis.org.uk
	East Ardsley Primary Academy – Sarah Talbot 0113 887 9023 s.talbot@eastardsley.leodis.org.uk
	Hill Top Primary Academy – Joanne Lancaster 0113 307 4750 j.lancaster@hilltop.leodis.org.uk
	Westerton Primary Academy – David Livie 0113 253 3504 d.livie@westerton.leodis.org.uk
	Woodkirk Academy – Tim Jones 0113 887 3500 t.jones@woodkirk.leodis.org.uk

Trust HR Manager	Sally Adkin 0113 340 0036 s.adkin@leodis.org.uk
Chief Operating Officer	Katy Stringer 0113 340 0025 k.stringer@leodis.org.uk
Appointed Whistleblowing Trustee	Colin Stribley 0113 340 0025 c.stribley@leodis.org.uk
CEO Principal	Joe Barton 0113 340 0025 j.barton@leodis.org.uk
Appointed Safeguarding Trustee	Steph Makin 0113 340 0025 info@leodis.org.uk
Chair of Trustees	Nick O'Donovan 0113 340 0025 info@leodis.org.uk
The Trust's external auditors	Saffery Champness 01423 568 012 info@saffery.com
Confidential counselling	This is available via SAS: 01773 814 400 https://schooladvice.co.uk/contact-us/

13.2 If your concern is regarding:

The safeguarding of children or young people, please call:	During Office Hours: 0113 376 0336 Out of normal office hours 0113 535 0600
The safeguarding of vulnerable adults, please call:	During Office Hours: 0113 222 4401 during office Out of normal office hours 0113 240 9536
Suspected Benefits Fraud: DWP National Benefit Fraud helpline:	0800 854 4400 www.gov.uk/report-benefit-fraud National Benefit Fraud Hotline, Mail Handling Site A, Wolverhampton WV98 2BP

13.3 Other useful contacts:

Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: www.protect-advice.org.uk
The NSPCC whistleblowing helpline	Helpline: 0800 028 0285 E-mail: help@nspcc.org.uk
Department for Education	Telephone: 0370 000 2288 www.gov.uk/government/organisations/department-for-education
Ofqual	Telephone: 0300 303 3344 www.gov.uk/government/organisations/ofqual

14. RECORD KEEPING AND DATA PROTECTION

All written records will be kept by the Trust in line with our Privacy Notice, our Records Retention Policy and in line with the requirements of Data Protection Legislation.

15. REVIEW OF POLICY

This policy is reviewed annually by the Trust. We will monitor the application and outcomes of this policy to ensure it is working effectively.