



Whistleblowing Policy

Date approved:	17 March 2026	Date of next review:	March 2027
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1. Statement of Intent

The Grand Union Partnership (GUP) Multi Academy Trust is committed to a culture of transparency and accountability. In line with the **Academy Trust Handbook (ATH) 2025**, we encourage staff to "speak up" without fear of reprisal. This policy ensures that any individual who makes a "qualifying disclosure" in the public interest is protected from detriment or dismissal.

2. Statutory Framework

This policy is compliant with:

- Public Interest Disclosure Act (PIDA) 1998
- DfE (2025) 'Academy Trust Handbook' (ATH)
- DfE (2025) 'Keeping Children Safe in Education' (KCSIE)
- The School Attendance (Pupil Registration) (England) Regulations 2024

3. Definitions and Examples

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or "qualifying disclosures."

As outlined by the PIDA, **qualifying disclosures** pertain to when any of the following takes place:

- A criminal offence has been committed, is likely to be committed or is being committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed

Relevant updates with regard to Multi Academy Trusts cite some sector specific examples where whistleblowing might occur:

3.1 Financial & Governance Malpractice (ATH 2025 Updates)

- **Cyber-Ransom:** Any pressure to pay a cyber-ransom demand (prohibited under ATH 2025).
- **Estate Management:** Deliberate failure to meet School Estate Management Standards, leading to unsafe environments.

3.2 School-Specific Operational Examples

- Manipulation of pupil data, attendance registers, or exam results.

- Misuse of ring-fenced funding (e.g., Pupil Premium or PE & Sport Premium).
- Safeguarding Risks (KCSIE 2025): Systemic failure to monitor online content or address risks of misinformation and radicalisation.
- Deliberate failure to provide statutory SEND provision as outlined in an EHC Plan.

4. Roles and Responsibilities: The GUP Tiered Hierarchy

To ensure impartial oversight across our five schools, the following reporting lines must be followed:

- **Level 1 (School Level):** Report to the **Headteacher**.
- **Level 2 (Trust Level):** If the concern is about the Headteacher or involves Trust-wide resources, report to the **CEO**.
- **Level 3 (Governance Level):** If the concern is about the CEO or a Trustee, report to the **Chair of Trustees**.
- **Accounting Officer Personal Duty:** The Trust's Accounting Officer has a statutory duty to report any perceived irregularity to the DfE, regardless of internal pressure.

5. Procedure

5.1 Raising a Concern

Concerns should be submitted in writing to the appropriate Level lead (see Section 4). The disclosure should include the background, relevant dates, and the specific reasons for the concern.

5.2 Anonymous Allegations

The Trust **will** investigate anonymous allegations where the concern is credible and serious. However, we encourage staff to put their name to disclosures to facilitate a more thorough investigation and ensure they receive PIDA legal protection.

6. Investigation Protocol

6.1 Acknowledgment

The Lead Officer will acknowledge the concern in writing within 10 working days, providing an estimate of how long the investigation will take.

6.2 Impartiality in a MAT

To prevent local bias, the CEO reserves the right to appoint a **Headteacher from a different GUP school** or an **independent external investigator** to lead the investigation if a conflict of interest is identified.

7. External Reporting Routes

If internal routes are inappropriate, staff may contact:

- **DfE Regions Group:** For financial and governance concerns (replaces ESFA).
- **Ofsted Whistleblowing Hotline:** 0300 123 3155.
- **NSPCC Whistleblowing Helpline:** 0800 028 0285 (for systemic safeguarding failures).
- **Protect:** (Independent whistleblowing charity) 020 3117 2520.

8. Whistleblowing vs. Low-Level Concerns

It is vital to distinguish between these two processes:

- **Whistleblowing:** For serious, systemic malpractice or illegal acts (e.g., fraud, safety breaches).
- **Low-Level Concerns:** For nuances in staff behaviour that do not meet the "harm threshold" but cause concern. These should be reported via the **Staff Code of Conduct / Low-Level Concerns Policy**.

9. Monitoring and Review

The Trust Board will review this policy annually to ensure it remains aligned with the latest DfE updates. The next review is scheduled for **March 2027**.